

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)
)
 v.) Crim. No. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

AGREED-UPON PRELIMINARY JURY INSTRUCTIONS

Counsel for the government and for the defendant, Dzhokhar Tsarnaev, hereby submit the attached agreed-upon proposed jury instructions to be given (1) to the jury venire members prior to the distribution of written questionnaires, and (2) prior to the beginning of oral questioning of prospective jurors on their voir dire.

Dated: December 1, 2014

Respectfully Submitted,

DZHOKHAR TSARNAEV
By his attorneys

/s/ *David I. Bruck*

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Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on December 1, 2014.

/s/ David I. Bruck